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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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OFFICE OF THE SECRETARY

In the Matter of
Billed Party Preference
for 0+ InterLATA Calls

CC Docket No. 92-77
Phase I

COMMENTS OF ONE CALL COMMUNICATIONS, INC. d/b/a OPTICOM

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COMMENTS

One Call Communications, Inc., d/b/a OPTICOM ("Opticom"), ^{1/} by its attorneys and pursuant to the Commission's request in the above-referenced docket, ^{2/} hereby submits comments concerning methods for compensating OSPs for transferring 0+ dialed proprietary card calls to card issuers for completion.

I. INTRODUCTION AND SUMMARY

In its Request, the Commission seeks comment "on methods for compensating operator service providers who continue to receive 0+ dialed proprietary calling card calls and who wish

^{1/} Opticom is an Operator Service Provider ("OSP") headquartered in Carmel, Indiana. Opticom handles a significant number of proprietary calling card calls. Consequently, Opticom incurs substantial, unreimbursed costs handling those calls.

^{2/} Report and Order and Request for Supplemental Comment, FCC 92-465 (released: Nov. 6, 1992) ("Request"). The date for filing comments was deferred by the Chief, Common Carrier Bureau from December 7, 1992 to December 14, 1992. Order Deferring Supplemental Comment Date, DA 92-1637 (released: Dec. 2, 1992).

to transfer those calls to the card issuer for completion."^{3/} Opticom addresses this issue by demonstrating that OSPs must be reimbursed for their efforts to route these calls to the card issuer.^{4/}

There are currently three viable alternatives for OSPs servicing proprietary card users: (1) advising the user to hang up and dial the card issuer's access number; (2) "splashing back" or rerouting the call to the originating LEC, which would then connect the call to the card issuer's nearest point of presence; or (3) transforming the call directly to the card issuer's network. Under the first alternative, the calling party is inconvenienced by the need to redial.^{5/} Under the second alternative, the calling party is inconvenienced by rerouting the call back to the originating LEC. Moreover, such rerouting is inefficient. Under the third alternative, however, the calling party is not

^{3/} Request at ¶ 64.

^{4/} Opticom submits that OSPs should also be compensated for informing calling parties how to gain access to the card issuer's network through alternative dialing arrangements or, as described below, for splashing the call back to the local exchange carrier ("LEC").

^{5/} This inconvenience lies at the heart of the remedy adopted in the Request, namely, the imposition of "consumer education" requirements on AT&T.

inconvenienced.^{6/} The third alternative also does not involve the inefficient use of facilities because the call can be routed directly to the card issuing IXC.^{7/} On the other hand, the third alternative requires OSPs to incur substantial costs to ensure that the call is completed.^{8/} Thus, in light of the overwhelming public interest considerations in favor of customer dialing convenience, OSPs should be compensated for this activity.^{9/}

Opticom submits that OSPs, at the very least, should be compensated for transferring 0+ calls but that the vehicle for such compensation should be at the discretion of the

6/ Specifically, and as set forth in the Request in support of the remedy of "consumer education," the third alternative allows calling parties to "complete their card calls as dialed on the first attempt," makes "away-from-home calling more user-friendly," and is obtained "without forcing a change in the dialing habits" of proprietary calling cardholders. Request at ¶ 56.

7/ In the event that the call is indirectly routed through an LEC, the convenience to the calling party remains paramount.

8/ See id. at ¶ 55 where the Commission recognizes that OSPs "incur processing costs" when they receive AT&T proprietary calling card calls. See also supra note 4. Although the first two alternatives also require OSPs to incur costs, these comments are directed to calls that are transferred because the calling party uses a proprietary calling card. As stated above, however, Opticom believes that calls transferred for any reason should be compensated.

9/ Cf. In the Matter of Policies and Rules Concerning Operator Service Access and Pay Telephone Compensation, 6 FCC Rcd 4736 (1991).

transferring carrier.^{10/} In other words, the transferring carrier should decide whether transfers will take place pursuant to carrier-to-carrier contracts or tariff.^{11/} In the event that a card issuer does not enter into such a contract or does not subscribe to such a tariff, the Commission should then establish through routes and through rates for 0+ calls that are transferred to that card issuer.

II. DISCUSSION

A. OSPs SHOULD PROVIDE 0+ TRANSFER SERVICES PURSUANT TO EITHER CONTRACT OR TARIFF

Opticom is willing to negotiate carrier-to-carrier contracts with proprietary card issuers for 0+ transfer services. In this way, Opticom would be able to obtain mutually agreeable arrangements with each proprietary card issuer reflecting the particular circumstances of each

^{10/} OSPs can route calls to proprietary calling card issuers on a seamless basis through the use of dedicated or switched facilities. Moreover, OSPs can route such calls complete with Automatic Number Identification ("ANI") information to determine the call's point of origin. NTS Petition, In the Matter of National Telephone Services Petition for Declaratory Ruling that AT&T Should Establish a Through Rate and a Reasonable Division of Charges, File No. ENF-89-2 ("NTS Proceeding"), at 3. Routing calls with ANI would avoid violating Section 226(b)(1)(H) of the Telephone Operator Consumer Services Improvement Act of 1990, Pub. L. No. 101-435, 104 Stat. 986 (1990).

^{11/} As the Commission is aware, Opticom is always able to file a tariff and, for that matter, enter into carrier-to-carrier arrangements. AT&T v. FCC, 487 F.2d 864, 875 (2d Cir. 1973).

proprietary card.^{12/} If such carrier-to-carrier arrangements are not possible to secure in a timely manner, Opticom is also amenable to filing 0+ transfer service tariffs.^{13/}

The Commission has approved tariffs for similar services. For example, the Commission has established a uniform system through which LECs recover access costs incurred in originating as well as terminating 1+ calls.^{14/} The Commission has also permitted LECs to recover similar costs associated with 0-transfer services.^{15/} Access to the proprietary card

^{12/} Such contracts between carriers are permissible under the Communications Act. Bell Tel. Co. of Pennsylvania v. FCC, 503 F.2d 1250, 1276 (3d Cir. 1974) (carrier-to-carrier contracts "represent a legitimate method of ordering business relations under Congress' regulatory legislation.")

^{13/} Opticom believes that the Commission's concerns leading to the rejection of Capital Network System, Inc.'s ("CNSI's") proposal to introduce tariffed 0+ transfer services for proprietary calling card calls can be satisfied. In the Matter of Capital Network Systems, Inc., FCC 92-512 (released: Dec. 2, 1992) ("CNSI Order"), aff'd, 6 FCC Rcd 5609 (CCB 1991). Specifically, and apparently unlike the CNSI proposal, the card issuer would order the service. The OSP, in a similar manner that IXCs are charged for 1+ access service or 0- service, would charge the card issuer for calls actually transferred. CNSI Order at ¶ 9. Furthermore, the rates, terms and conditions used in the tariff would be clear and explicit. Id. at ¶ 11.

^{14/} See 93 FCC 2d at 254-260. See also, In the Matter of Investigation of Access and Divestiture Related Tariffs, 97 FCC 2d 1082 (1984).

^{15/} See, e.g., In the Matter of Contel Telephone Co. Petition for Waiver of Section 69.4(b) of the Commission's Rules, 6 FCC Rcd 1590 (CCB 1991); In the Matter of Illinois Cons.

issuer's network via OSP and LEC networks is identical, and OSPs are entitled to recover associated costs by contract or tariff.

In response to the Commission's direction,^{16/} Opticom addresses the Commission's questions about how its 0+ transfer service would be tarified.

1. Definition of the Service Provided

The 0+ transfer service provided by OSPs could be defined in a similar manner as the definition of access service, namely, "services and facilities provided for the origination or termination of any interstate or foreign telecommunication using a proprietary calling card."^{17/} Alternatively, 0+ transfer service could be defined in a similar manner as the definition contained in the Operator Transfer Service tariffs for 0- calls.

2. When Transfer Charges Would be Assessed

Opticom believes that OSPs should be compensated for completed proprietary calling card calls that they have

[FOOTNOTE CONTINUED FROM PREVIOUS PAGE]

Tel. Co. Petition for Waiver of Part 69 Regarding Operator Transfer, 5 FCC Rcd 3246 (CCB 1990); In the Matter of NYNEX Petition for Waiver, 63 R.R.2d 1087 (CCB 1987); In the Matter of the Bell Atlantic Telephone Companies, 4 FCC Rcd 455 (CCB 1988).

^{16/} Request at ¶ 64.

^{17/} Cf. 47 C.F.R. § 69.2(b).

transferred. Similar to 1+ access services and 0- transfer services, charges for 0+ transfer services should be incurred once the proprietary calling card call is received by the card issuer.

3. Confirmation of Receipt of Call by Card Issuer

Opticom believes that OSPs should not be required to confirm receipt of calling card calls by the card issuer before the OSP receives compensation. Instead, it submits that similar to access and 0- services, AT&T and other card issuers can verify receipt of the call and compare such information with tariffed invoices of OSPs.

4. Card Issuer Subscription to Service

Opticom submits that card issuers would subscribe to the service pursuant to the terms and conditions of the applicable tariff.

5. Cost Elements Recovered through the Tariffed Rate

Opticom believes that all cost elements related to 0+ transfer services should be recovered by OSPs. Cost elements include access costs to the OSP and access costs from the OSP to the card issuer, including the costs incurred at the OSP's point of presence. Overall, therefore, the cost elements should not vary appreciably from the cost elements for switched and special access depending on the type of connection used by the OSP.

6. Cost Support Necessary for Tariffs

The filing carrier should be required to submit information which it feels is necessary to justify its 0+ transfer service offering. If necessary, the Commission can request additional information.

B. IN THE ALTERNATIVE, THE COMMISSION SHOULD ESTABLISH THROUGH ROUTES AND THROUGH RATES

If contracts prove to be unattainable but card issuers refuse to subscribe to 0+ transfer service tariffs, the Commission should then order through routes and through rates for OSPs needing to access that card issuer. Specifically, the Commission should establish a through route and charges "applicable thereto" under Section 201(a).

As defined by the Commission, a through route under Section 201(a) of the Act is "'an arrangement, express or implied, between connecting [carriers] for continuous carriage . . . from the originating point on the line of one carrier to the destination on the line of another.'" In the Matter of MTS and WATS Market Structure, 93 FCC 2d 241, 255, n. 16 (1983) (quoting St. Louis Southwestern R. Co. v. United States, 245 U.S. 136, 139 n.4 (1917) (decided under related provisions of

the Interstate Commerce Act)). Thus, a through route exists whenever an originating OSP routes a call to a card issuer.^{18/}

The question before the Commission would not be the nature of a through route but whether, as instructed by Section 201(a), through routes and through rates in that instance are in the public interest.^{19/} For the same reasons discussed above in the context of transfer service, through routes for 0+

^{18/} Arguably, a through route is established even if the routing is the result of an OSP directing a user to hang up and redial or the call is splashed back to the originating LEC. See, In the Matter of Teleconnect Co. v. The Bell Tel. Co. of Penn., 6 F.C.C.Rcd 5202, 5206 (CCB 1991) (citing Nat'l. Ass'n. of Regulatory Util. Comm'rs. v. F.C.C., 746 F.2d 1492, 1498 (D.C. Cir. 1984)). See also, In the Matter of Access Billing Requirements for Joint Service Provisioning, CC Dkt. No. 87-579, Phase II (released: Oct. 4, 1988). (It should be noted at this point that AT&T has argued that routing proprietary calling card calls constitutes nothing more than a billing and collection arrangement. Comments of AT&T, NTS Proceeding, at 7. The routing of 0+ calls, similar to the routing of 1+ and 0-calls, is not for the purpose of billing and collection but is for the purpose of completing the call. Moreover, card issuer transmission facilities would be utilized satisfying AT&T's definition of a communication service. See Opposition of AT&T, NTS Proceeding, at 8. As such, it is clearly a communications service under the Communications Act.)

^{19/} Upon such a finding, Section 201(a) requires carriers "to establish through routes and charges applicable thereto and the divisions of such charges." In short, carriers may recover costs that are "fairly attributable" to through route services. Baltimore and Ohio R.R. v. United States, 298 U.S. 349, 373 (1936) (decided under Interstate Commerce Act); I.C.C. v. Hoboken Manuf. R.R., 320 U.S. 368, 379 (1943) (decided under the Interstate Commerce Act).

proprietary calling card calls are clearly in the public interest.^{20/}

The end user --in this case the proprietary calling card caller -- will be well-served by these routes because their preference for using their calling card will be honored without the need to splash back or redial. The very purpose of OSP O+ transfers of calling card calls is to facilitate and enable easier access to the network of the card issuer.^{21/} Indeed, it cannot be argued that these transfers are not in the public interest without concurrently arguing that access of calling card callers to proprietary calling card issuer networks is not in the public interest -- an issue that has already been resolved by the Commission in this Docket.^{22/}

III. CONCLUSION

Opticom submits that the Commission should require proprietary card issuers to compensate OSPs for providing O+


^{20/} Through routes are also more efficient than the hang-up and redial alternative. Contrary to AT&T's arguments in the NTS Proceeding that through routes are inefficient because calls are forced to go through LEC networks instead of directly through AT&T's network, Opposition of AT&T, NTS Proceeding, at 16-17, through routes can actually save time, reduce duplicative costs and promote efficiency with a direct link between the OSP and the card issuer network.

^{21/} AT&T, for instance, has acknowledged the "pointless inconvenience" of making the customer hang up and redial 10XXX. Request at ¶ 28.

^{22/} In rejecting the O+ public domain proposal, the Commission found that "IXC proprietary cards are a useful vehicle for permitting consumer choice of carrier." Id. at ¶ 47.

transfer services. OSPs should, at their option, contract with card issuers or file tariffs. Absent either a contract or the subscription to a tariff by card issuers, the Commission should then order through routes and through rates.

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CERTIFICATE OF SERVICE

I, Simin Barbour, hereby certify that copies of the foregoing Comments of One Call Communications, Inc. were served by first class mail, postage prepaid, this 14th day of December, 1992, to the persons listed on the attached Service List.


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